

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

**EX PARTE MOTION OF THE 36TH DISTRICT COURT FOR AN ORDER
AUTHORIZING IT TO FILE A REPLY IN EXCESS OF PAGE LIMIT**

The 36th District Court, by and through its undersigned attorneys, hereby moves the Court (the “Motion”), pursuant to Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the “Local Bankruptcy Rules”), for the entry of an order authorizing the 36th District Court to file its reply (the “Reply”) to the *Local 3308 and Local 917 of the American Federation of State, County and Municipal Employees’ Objection to Motion of Debtor for Entry of an Order Extending the Chapter 9 Stay to the 36th District Court and Certain Related Parties* and brief in support thereof [Dkt. Nos. 1125 – 1126] (collectively, the “Objection”) in excess of the page limit imposed by Local Bankruptcy Rule 9014-1(e).¹ In support of this Motion, the 36th District Court states as follows:

1. On October 9, 2013, the Local 3308 and Local 917 of the American Federation of State, County and Municipal Employees (collectively “AFSCME”) filed the Objection, including a fifteen page supporting brief.

2. Local Rule 9014-1(e) restricts the 36th District Court’s Reply to the Objection to five pages. E.D. Mich. LBR 9014-1(e).

3. The 36th District Court submits that it requires more than five pages to meaningfully respond to the issues raised in the Objection. Accordingly, the 36th District Court

¹ Pursuant to Local Bankruptcy Rule 9014-1(e), reply briefs are limited to five (5) pages in length.

respectfully requests that it be granted relief from Local Bankruptcy Rule 9014-1(e) and permitted to file its Reply in excess of the page limitation.

WHEREFORE, the 36th District Court respectfully requests that the Court: (i) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to the 36th District Court as the Court deems just.

Dated: October 15, 2013

Respectfully submitted,

36th DISTRICT COURT

By: /s/ John T. Gregg
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SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Bankruptcy Rule 9014-1(b):

Exhibit 1	Proposed Form of Order
Exhibit 2	None [Motion Seeks <i>Ex Parte</i> Relief]
Exhibit 3	None [Brief Not Required]
Exhibit 4	None [Separate Certificate of Service To Be Filed]
Exhibit 5	None [No Affidavits Filed Specific to This Motion]
Exhibit 6	None [No Documentary Exhibits Filed Specific to This Motion]

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

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Hon. Steven W. Rhodes

**EX PARTE ORDER AUTHORIZING THE 36TH DISTRICT COURT
TO FILE A REPLY IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte Motion of the 36th District Court for an Order Authorizing it to File a Reply in Excess of Page Limit* (the “Motion”); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The 36th District Court is granted relief from Local Bankruptcy Rule 9014-1(e) and may file its Reply in excess of five pages.